

## State Water Resources Control Board

### DRAFT REVIEW SUMMARY REPORT – ADDITIONAL WORK PRELIMINARY REVIEW – AUGUST 2014

#### Current Agency Information

Agency Name: San Francisco Bay RWQCB (Regional Water Board)	Address: 1515 Clay Street, Suite 1400 Oakland, CA 94612
Agency Caseworker: Barbara Sieminski	Case No.: 01-2257
Agency Name: Alameda County Water District (ACWD)	Address: 43885 South Grimmer Blvd. Fremont, CA 94538
Agency Caseworker: Doug Young	Case No.: TT0571

#### Case Information

USTCF Claim No.: 15611	GeoTracker Global ID: T0600102073
Site Name: Chevron #9-3751	Site Address: 5502 Thornton Avenue Newark, CA 94560
Responsible Party: Chevron Product Co. Attn: Rod Simmons	Address: PO Box 6004 San Ramon, CA 94583
USTCF Expenditures to Date: \$0	Number of Years Case Open: 21

To view all public documents for this case available on GeoTracker use the following URL:

URL: [http://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=T0600102073](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600102073)

#### Summary

The Low-Threat Underground Storage Tank (UST) Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Policy. This case does not meet all of the required criteria of the Policy. Highlights of the case follow:

This Site is an active commercial petroleum fueling facility. An unauthorized release was reported in May 1993. Three 10,000-gallon gasoline USTs were removed and approximately 500 cubic yards of impacted soil were excavated to between 11 and 19 feet below ground surface (bgs) and disposed offsite in 1997. Groundwater extraction was conducted between May 2002 and June 2011, which removed approximately 10 million gallons of contaminated groundwater including 100 pounds of total petroleum hydrocarbons as gasoline (TPHg) and 319 pounds of methyl tert-butyl ether (MTBE). In-situ chemical oxidation which included sodium persulfate injection was conducted between September 2009 and November 2011. Since 1998, 55 groundwater monitoring wells have been installed and monitored. According to groundwater data, water quality objectives have been achieved or nearly achieved.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public water supply wells or surface water bodies within 1,000 feet of the defined plume boundary. No other water supply wells have been identified

within 1,000 feet of the defined plume boundary in files reviewed. The unauthorized release is located within the service area of a public water system as defined in the Policy. The affected shallow groundwater is not currently being used as a source of drinking water, and it is highly unlikely that the affected groundwater will be used as a source of drinking water in the foreseeable future.

#### **Rationale for Closure under the Policy**

- **General Criteria:** The case does not meet all eight Policy general criteria. Recoverable free product remains.
- **Groundwater Specific Criteria:** Fails, it appears the plume is not stable and there is evidence suggesting that a secondary source may be present. Further, threats to water supply wells may exist.
- **Vapor Intrusion to Indoor Air:** The case, in regards to the Site property, meets the Policy Exclusion for an Active Commercial Petroleum Fueling Facility. Soil vapor evaluation is not required because the Site is an active commercial petroleum fueling facility and the release characteristics do not pose an unacceptable health risk. Vapor intrusion for off-site downgradient commercial and residential buildings is not a risk due to groundwater being 20 feet below ground surface (bgs) which provides the minimum 10 feet bioattenuation zone.
- **Direct Contact and Outdoor Air Exposure:** The case meets Policy Criterion 3a. Maximum concentrations in soil are less than those in Policy Table 1 for Commercial/Industrial use, and the concentration limits for a Utility Worker are not exceeded. There are no soil sample results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2 percent benzene and 0.25 percent naphthalene. Therefore, benzene can be used as a surrogate for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Policy Table 1. Therefore, the estimated naphthalene concentrations meet the thresholds in Table 1 and the Policy criteria for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

#### **Objections to Closure and Responses**

The ACWD and the Regional Water Board (July 21, 2014 phone conversation) oppose closure because:

- Contaminant plume appears to not be stable and likely has a secondary source as evidenced by the presence of "new" free product (well P-13).  
RESPONSE: The State Water Board concurs that stability of the contaminated plume has not yet been demonstrated. The recent appearance of free product in well P-13 suggests the continued presence of a secondary source – exposed by recent low groundwater levels.
- The case does not meet Policy groundwater criteria. The site has free product while the plume is greater than 250 feet in length and a threat to a reported agricultural well downgradient of well MW-17 may exist.  
RESPONSE: Agreed.

**Recommendation**

The Fund recommends that the ACWD and Regional Water Board direct the Responsible Party to perform the following actions in order to achieve Policy guidelines in a timely manner:

- Continue to monitor and sample the groundwater monitoring wells to further evaluate contaminant plume stability,
- Evaluate if the contaminant plume poses a threat to water supply wells,
- Prepare a remedial action plan and propose a remedial action appropriate to Site conditions.

  
\_\_\_\_\_  
Kirk Larson, P.G.                      8/15/14  
Engineering Geologist              Date  
Technical Review Unit  
(916) 341-5663

  
\_\_\_\_\_  
Robert Trommer, C.H.G.              8/15/14  
Senior Engineering Geologist      Date  
Chief, Technical Review Unit  
(916) 341-5684

